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10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 CASE NO. 3:17-cv-00939-WHA

15 Plaintiff,

16 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S MOTION
FOR RECONSIDERATION OF ORDER
GRANTING IN PART AND DENYING IN
PART ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (DKT. 2326)**

17 vs.

18 UBER TECHNOLOGIES, INC.;
19 OTTOMOTTO LLC; OTTO TRUCKING
20 LLC,

21 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC’s Motion for
7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under
8 Seal (Dkt. 2326) (“Motion for Reconsideration”). The Motion for Reconsideration seeks an order
9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Plaintiff’s Responses and Objections to Uber’s Fifth Set of Interrogatories
11 (Nos. 18-24) (previously filed as Exhibit 1 at Dkt. 1214-6/1294-4) marked in red boxes on page 12, lines
12 20-24 of the sealed version filed concurrently herewith as Exhibit A (in addition to passages previously
13 granted sealing) disclose confidential information regarding actual and contemplated Waymo
14 acquisitions.

15 4. The portions of the July 30, 2017 email from Andrea P. Roberts to counsel for Defendants
16 (previously filed as Exhibit 6 at Dkt. 1214-16/1294-14) marked in red boxes on pages 20-21 and 24-28 of
17 the sealed version filed concurrently herewith as Exhibit B consist of proposed search terms that would
18 disclose Waymo’s trade secrets or detailed technical information from which key aspects of those
19 trade secrets could be inferred. I understand that public disclosure of these portions could destroy
20 Waymo’s asserted trade secrets, which would cause Waymo significant competitive harm.

21 5. Waymo’s current request to seal is more narrowly tailored than its prior sealing
22 requests with respect to Exhibits A-B.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on December 11, 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

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8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

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12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven

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